

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

BARRY WARE,

*Defendant.*

**No. 08 CR 00122**

**Judge Harry D. Leinenweber**

**DEFENDANT, BARRY WARE'S MOTION TO REQUIRE GOVERNMENT TO  
MAKE A SANTIAGO PROFFER STATEMENT**

NOW COMES the defendant, BARRY WARE (hereinafter, "defendant"), by and through his attorney, STANLEY L. HILL, and respectfully moves this Honorable Court for an order directing that the government be required to make a Santiago Proffer Statement prior to permitting any hearsay testimony to be used against defendant and/or any co-defendant[s].

Respectfully submitted,

/s/ Stanley L. Hill

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